

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

REENA S. MATHEW,

Plaintiff,

VS.

SANTANDER CONSUMER USA INC.,

Defendant.

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CIVIL ACTION NO. 3:23-CV-01494-N

**DEFENDANT’S OBJECTIONS TO PLAINTIFF’S
SECOND AMENDED TRIAL EXHIBIT LIST**

TO THE CHIEF UNITED STATES DISTRICT JUDGE DAVID C. GODBEY:

Pursuant to Rule 26(a)(3)(B) of the Federal Rules of Civil Procedure, Defendant Santander Consumer USA Inc. (“Santander”) files its Objections to Plaintiff Reena Mathew’s (“Mathew”) Second Amended Exhibit List [ECF No. 114], as follows:

**I.
OBJECTIONS**

Pl.’s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
1	Offer letter	SC000771-772	No objection.
2	Progressive Discipline Policy 2013	SC010464-10470	No objection.
3	Job description, Human Resources Business Partner	SC008348-8350	No objection.
4	2012 Annual Objectives	SC000987-990	No objection.
5	2014 Santander Performance Review (Reena Mathew)	SC000121-138	No objection.

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
6	2015 Mid-Year Review	Mathew 5-9	No objection.
7	Email re Confidential - Performance Review Feedback	SC000044-45	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
8	Emails re Termination Tyrone Wilson	SC001449-50	No objection.
9	IMs between Mathew and Hullum	SC002732	No objection.
10	Emails re Byron N.	SC001013-1014	No objection.
11	Emails re 2015 goals	SC003093-3094	No objection.
12	Emails re Perfect Attendance Question	SC004015-4017	No objection.
13	Email Hullum to Mathew re Reallocation of duties	SC000758-759	No objection.
14	Emails re HR Business Partner Model	SC004138-4139	No objection.
15	IMs between Mathew and Hullum	Mathew 256-257	Objection: 1. Hearsay. Fed R. Evid. 802.
16	Email re HR Org Chart – Updated (plus the attached chart)	SC010106-10111	No objection.
17	Elad broadcast email re HR Org Change Announcement	SC008380-8381	No objection.

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
18	Outlook calendar documents scheduling an introductory meeting between Mathew and Adriano for 8/26/15	SC003993 and SC 3994	No objection.
19	Email Mathew to Adriano re PTO Request	SC006972	No objection.
20	Email from Yessica Adriano re Team Meeting Recap	SC005719	No objection.
21	Emails re New Leadership	SC005763-5764	No objection.
22	Emails re Perfect Attendance Proposal, plus attachment	SC003244-3246	No objection.
23	Emails re Perfect Attendance Proposal	SC005798	No objection.
24	Emails re Perfect Attendance Proposal plus attachment	SC005709-5710	Objection: 1. This is merely a less inclusive e-mail thread of Plaintiff's proposed exhibit number 26. It therefore has no probative value and may mislead the jury, cause undue delay, waste time, and needlessly present cumulative evidence. Fed. R. Evid. 403.
25	Emails re Perfect Attendance Proposal	SC007518	Objection: 1. This is merely a less inclusive e-mail thread of Plaintiff's proposed exhibit number 26. It therefore has no probative value and may mislead the jury, cause undue delay, waste time, and needlessly present cumulative evidence. Fed. R. Evid. 403.
26	Emails re Perfect Attendance Proposal	Mathew 3-4	No objection.
27	Email re DA's	SC004074	No objection.

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
28	IMs between Mathew and Adriano ECF Doc. 25, App.174	[this page has no Bates number]	No objection.
29	Emails re Investigation Checklist (5)	SC005492	No objection.
30	Emails re Perfect Attendance Proposal	Mathew 282-284	No objection.
31	Emails re Investigation Template	SC005910-5913	No objection.
32	IMs between Mathew and Adriano	SC002773	No objection.
33	IMs between Mathew and Adriano	SC002752	No objection.
34	Emails re Loss Recovery Team - LEW	SC009926	No objection.
35	Email Elad to Blackburn re Reena Mathew - Confidential	SC001690	No objection.
36	Email Elad to Whatley (no subject)	SC007514	No objection.
37	Emails re Reena: Workload	SC006293-6294	No objection.
38	Email Adriano to Elad re Time Line of Events (plus attachment)	SC005252-5255	No objection.
39	Emails re PTO	Mathew 17-18	No objection.
40	Email Hullum to Adriano re Reena	SC007444-7456	No objection.
41	Email Adriano to Elad re Reena PIP	SC005408-5409	No objection.
42	Performance Improvement Plan	SC001154-1156	No objection.
43	Email Adriano to Elad re Reena	SC001056-1057	No objection.
44	Email Elad to Blackburn re Reena Mathew	SC001691	No objection.
45	Email Adriano to Elad re Time Line of Events	SC007206-7209	No objection.
46	Email Mathew to Elad re Meeting	SC003927	No objection.

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
47	Emails re Reena	SC007441	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
48	Email Mathew to Whatley re Hello	SC001709	No objection.
49	Emails re Herman	Mathew 34-37	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403. 3. Hearsay. Fed R. Evid. 802.
50	Emails re Hello.	SC001710-1711.	No objection.
51	Emails re Reena Mathew – Confidential	SC001702-1703	Objection: 1. Hearsay. Fed R. Evid. 802.
52	Email Mathew to Shaffer re Thank You	Mathew 38-39	No objection.
53	Emails re Leave Early Requests	SC001119	No objection.
54	Email Mathew to Adriano re Recap of Conversation with Deirdre Crouch	SC003215	No objection.
55	Emails between Mathew and Blackburn re Hello	SC003123-3124	No objection.

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
56	Email from Elad to Blackburn re Meeting with Reena - Notes	SC001120-1121	No objection.
57	Emails between Elad and Hullum re Reena	SC001118	No objection.
58	Email Adriano to Mathew re Follow up	SC001153	No objection.
59	Emails re Reena Notes	SC000928-930	No objection.
60	Emails re Thank You	SC002909-2910	No objection.
61	Emails re Reena Mathew	SC004970-4972	No objection.
62	Emails between Blackburn and Shaffer re Default Deadline Reminder	SC004984-4985	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
63	Email Adriano to Elad re D. Crouch - Investigation Summary	SC005429-31	No objection.
64	Emails re Investigation Material	SC008463	No objection.
65	Emails re Investigation Material	SC004801	No objection.
66	Emails re D. Crouch - Investigation Summary-CONFIDENTIAL	SC009897-9899	No objection.
67	Emails re Perfect Attendance Proposal	SC003530-3531	Objection: 1. Hearsay. Fed R. Evid. 802.
68	Emails re Reena – Dr. Appt.	SC00757	No objection.
69	Email from Shaffer re Reena	SC005112	No objection.
70	Final Report for HR.	SC000021-30	No objection.

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
71	Emails re Holiday Pay	Mathew 42-44	No objection.
72	Emails re Holiday Pay	SC004058-4060	No objection.
73	Emails re Approval FMLA for Reena Mathew EMPID 103696	SC000666-668	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
74	Emails re Reena Mathew	SC004983	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
75	Emails re R. Mathew	SC0014-15	No objection.
76	Emails re Update and next steps regarding your issues	SC003410	No objection.
77	Emails re: Headcount	SC009165-9166	No objection.
78	Emails re 8585 Coverage	SC006502	No objection.
79	Email Adriano to Elad re Updated PIP and Action Plan- Use this one	SC006306	No objection.
80	Email Adriano to Elad re Updated PIP and Action Plan- Use this	SC006306	No objection.

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
	one		
81	Emails between Adriano and Elad re Reena – Docs	SC006892	No objection.
82	90 Day Action Plan (a draft)	SC010330	No objection.
83	90 Day Action Plan	Mathew 47-48	No objection.
84	Performance Improvement Plan and Timeline of Events	Mathew 49-55	No objection.
85	Emails re Meeting you requested (plus attachment)	SC004169-4176	No objection.
86	Emails re Reena Meeting Recap 01/15/16	SC001053-1054	No objection.
87	Emails re Last Chance to Register for February Monthly Luncheon	SC000747-750	No objection.
88	Emails re Perfect Attendance Proposal	SC006481-6482	No objection.
89	Email Shaffer to Mathew re Reminder	SC005102	No objection.
90	Emails Mathew to Adriano re Appts/Time Off	Mathew 84-85	No objection.
91	Emails re Summary of our conversation from last Wednesday	SC000275-281	No objection.
92	Letter from Gabrielle Klepper to Monte Hurst	Mathew 81-83	Objections: <ol style="list-style-type: none"> 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
93	Email Mathew to Adriano re Summary of Meeting	SC004104	No objection.
94	Emails re Summary of Meeting	SC006812-6813	No objection.
95	Email Adriano to Mathew re Example of Investigation summary-confidential	SC006694-6696	No objection.
96	Letter from Monte Hurst to Gabrielle Klepper	Mathew 86	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
97	Investigation Notes re Rosalinda Coronado interview	SC002971	No objection.
98	Email Mathew to Adriano re Investigation Summary	SC002955-2956	No objection
99	IMs between Mathew and Adriano	SC002648-2649	No objection.
100	Emails re Reena Meeting Recap 01/15/16	SC000662-664	No objection.
101	Emails re Term	SC009264-9265	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
102	Emails to Catessa Malone	SC006838, 6606-6607, 6550-2, 6276, 5919, 5484-5486, 4776	No objection.
103	Emails re Investigation Summary	SC008291-8293	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
104	Email Mathew to Adriano re Recap	SC003260	No objection.
105	Emails between Mathew and Adriano re Recap	SC001079-1080	No objection.
106	Emails re Recap	SC002937-2940	No objection.
107	Emails re Recap	SC004026-4028	No objection.
108	Emails re Recap	SC000687-689	No objection.
109	Emails re Reena 90 Day Action Plan	SC006415	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403. 3. Hearsay. Fed. R. Evid. 802. 4. Privilege. Fed. R. Evid. 502. 5. Santander has also moved to exclude this evidence and testimony regarding this evidence in its Motion for

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
			Limine due to expected improper arguments regarding Santander's decision to hire legal representation relating to Mathew's accusations.
110	Emails re Reena 90 Day Action Plan	SC009172-9173	<p>Objections:</p> <ol style="list-style-type: none"> 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403. 3. Hearsay. Fed. R. Evid. 802. 4. Privilege. Fed, R. Evid. 502. 5. Santander has also moved to exclude this evidence and testimony regarding this evidence in its Motion for Limine due to expected improper arguments regarding Santander's decision to hire legal representation relating to Mathew's accusations.
111	Emails re Revised	SC006503-6504	<p>Objections:</p> <ol style="list-style-type: none"> 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403. 3. Hearsay. Fed. R. Evid. 802. 4. Privilege. Fed, R. Evid. 502.

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
			5. Santander has also moved to exclude this evidence and testimony regarding this evidence in its Motion for Limine due to expected improper arguments regarding Santander's decision to hire legal representation relating to Mathew's accusations.
112	30 Day Review	SC006924-6932	No objection.
113	Email Mathew to Adriano re Recap of Meeting	SC002100	No objection.
114	Emails re Attendance Recognition Program	SC009502-0503	No objection.
115	Emails re Attendance Recognition Program	SC006781-6783	No objection.
116	Emails re Attendance Recognition Program	SC002215-2216	No objection.
117	Emails re Attendance Recognition Program	SC006385-6386	No objection.
118	Emails re Attendance Report	SC002177-2178	No objection.
119	Emails re Attendance Report	SC000657-658	No objection.
120	Emails re Attendance Report	SC007005-7007	No objection.
121	Emails re Attendance Report	SC006575-6582	No objection.
122	Emails re Attendance Report	Mathew 291-296	Objection: 1. Not relevant. Fed. R. Evid. 401.
123	Emails re Recap of Meeting	SC010116-10117	No objection.
124	Emails re Recap of Meeting	SC008015 - 8016	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues,

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			misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403. 3. Hearsay. Fed. R. Evid. 802. 4. Privilege. Fed. R. Evid. 502. 5. Santander has also moved to exclude this evidence and testimony regarding this evidence in its Motion for Limine due to expected improper arguments regarding Santander's decision to hire legal representation relating to Mathew's accusations.
125	Emails re Recap of Meeting	SC005971-5972	No objection.
126	Emails re Recap of Meeting	SC009550-9552	No objection.
127	Emails re Recap of Meeting	SC005740-5471	No objection.
128	Email Mathew to Adriano re Recap	SC002148-2149	No objection.
129	Emails re Attendance Report.	Mathew 297-305	Objections: 1. Not relevant. Fed. R. Evid. 401.
130	Emails re Recap	SC006937-6938	No objection.
131	Emails re Recap	SC005685-5686	No objection.
132	Emails re Recap	SC005259-5260	No objection.
133	Emails re Recap	SC006633-6634	No objection.
134	Emails re Attendance Recognition Program	SC002038	No objection.
135	Emails between Elad and Shaffer re Reena	SC009308	No objection.
136	Emails re Attendance Recognition Program	SC002515-2516	No objection.

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
137	Email Adriano to Elad re LEW Crew	SC005211	No objection.
138	IMs between Mathew and Adriano	SC004245	No objection.
139	Email Adriano to Elad	SC005759	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403. 3. Hearsay. Fed. R. Evid. 802.
140	IMs between Mathew and Adriano	SC002635-2636	No objection.
141	Email Mathew to Adriano re Investigation Summary--Brittany Brodie	Mathew 320-321	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403. 3. Hearsay. Fed. R. Evid. 802.
142	Emails re Investigation Summary--Brittany Brodie	SC004461-4462	Objections: 4. Not relevant. Fed. R. Evid. 401. 5. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
			6. Hearsay. Fed. R. Evid. 802.
143	Email Adriano to Elad re Investigation Summary--Brittany Brodie	SC006687-6688	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403. 3. Hearsay. Fed. R. Evid. 802.
144	Email Adriano to Elad re Investigation Summary--Brittany Brodie	SC006353-6354	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403. 3. Hearsay. Fed. R. Evid. 802.
145	Emails re Brittany Brodie- Term Recommendation	SC007979-7981	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403. 3. Hearsay. Fed. R. Evid. 802.
146	Emails between Elad and Shaffer re Reena Mathew	SC008785	No objection.

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
147	Email Adriano to Hanes re Rev. Reena 90 Day Action Plan - 90 Day Check In	SC006452	<p>Objections:</p> <ol style="list-style-type: none"> 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403. 3. Hearsay. Fed. R. Evid. 802. 4. Privilege. Fed. R. Evid. 502. 5. Santander has also moved to exclude this evidence and testimony regarding this evidence in its Motion for Limine due to expected improper arguments regarding Santander's decision to hire legal representation relating to Mathew's accusations.
148	March 23, 2016 Meeting Recap	SC002422-2427	No objection.
149	90 Day Review	SC00717-719	No objection.
150	Emails re Reena Mathew	SC001736 -1737	No objection.
151	Emails Mathew to Blackburn, Burns re Hello, plus the attachments	M 322-24 [this is just the email – all of the attachments have been produced, they are Bates numbered, and the attachments will be included in this exhibit]	<p>Objection:</p> <ol style="list-style-type: none"> 1. Hearsay. Fed. R. Evid. 802.
152	Mathew's comments added to the March 23, 2016 Meeting Recap and the 90 Day Review	SC003544-3551	No objection.
153	Termination letter	SC005631	No objection.

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
154	EEOC Charge of Discrimination	SC000102	Objections: <ol style="list-style-type: none"> 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
155	EEOC Determination	Mathew 168-169	Objections: <ol style="list-style-type: none"> 2. Not relevant. Fed. R. Evid. 401. 3. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403. 4. Hearsay. Fed. R. Evid. 802. 5. Santander has also moved to exclude this evidence and testimony regarding this evidence in its Motion for Limine which more thoroughly explains why this proposed exhibit and references to it should not be permitted at trial.
156	EEOC Conciliation Failure and Notice of Rights	SC000103-106	Objections: <ol style="list-style-type: none"> 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting

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			<p>cumulative evidence. Fed. R. Evid. 403.</p> <p>3. Hearsay. Fed. R. Evid. 802.</p> <p>4. Santander has also moved to exclude this evidence and testimony regarding this evidence in its Motion for Limine which more thoroughly explains why this proposed exhibit and references to it should not be permitted at trial.</p>
157	Headcount emails and the attached spreadsheets	(the pages included in ECF Doc. 36 and numbered App. 310-385)	<p>Objection:</p> <p>1. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.</p>
158	Documents showing YEI points awarded to Mathew	Mathew 25-6	No objection.
159	YEI points charts from each party's summary judgment appendix	ECF Doc. 25, App. 071-108 ECF Doc. 35, App. 386-387	No objection.
160	Medical records from 11/07/2106.	SC011365-11368	No objection. However, the entire record (SC011330-397) should be admitted as opposed to just certain pages handpicked by Mathew.
161	2015 Annual Performance Review (Reena Mathew)	SC000936-943	No objection.
162	Email from Boyd to Adriano re Early Departure	SC007650	<p>Objections:</p> <p>1. Not relevant. Fed. R. Evid. 401.</p> <p>2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or</p>

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
			needlessly presenting cumulative evidence. Fed. R. Evid. 403.
163	Messages between Boyd and Adriano re PTO Request	SC008387	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
164	Emails between Adriano and Hullum re Reena	SC005678	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
165	Emails between Boyd and Adriano re Tomorrow	SC008134	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
166	Email from Elad to Adriano re today	SC009798	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by

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			a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
167	Email from Boyd to Adriano re Today	SC010187	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
168	Emails from Boyd and Adriano re PTO Update and Request	SC006898	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
169	Email from Adriano to Mathew and Boyd re Yaeli	SC005542	Objections: 1. Not relevant. Fed. R. Evid. 401. 2. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
170	Demonstrative Aid – Timeline of events September 2015 through April 2016		Objection: 1. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
171	Demonstrative Aid – Timeline of second PIP as instructed vs. as conducted		Objection: 1. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
172	Demonstrative Aid re Headcount spreadsheets		Objection: 1. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403.
173	2013 Santander Performance Review (Reena Mathew)	SC011372	No Objection
174	Santander Holdings USA, Inc. and Subsidiaries Consolidated Balance Sheet	SC010645	Objections: 1. Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. 403. 2. Santander has also moved to

Pl.'s Ex. No.	Description	Beginning Bates No. (Deposition Exhibit No.)	Objections
			<p>exclude this evidence and testimony regarding this evidence in its Motion for Limine which more thoroughly explains why this proposed exhibit and references to it should not be permitted at trial, or alternatively, should only be presented at the second phase of trial should the Court grant Santander's Motion to Bifurcate.</p>

Respectfully submitted,

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CERTIFICATE OF SERVICE

On February 24, 2025, I filed the foregoing document with the Clerk of the Court of the U.S. District Court for the Northern District of Texas. I hereby certify that I have served the document on Plaintiff's counsel as follows in compliance with Rule 5(b) of the Federal Rules of Civil Procedure:

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